

EXHIBIT C

Declaration of Thelma M. Sims

My name is Thelma M. Sims. I am serving as the CDI Consultant Program Director for Sussex County Head Start, and have been an employee and consultant with the CDI since May 11, 2003.

On December 7, 2005, a conference call was convened between representatives of CDI, and ACF. It was agreed during that call that CDI and ACF would immediately contact Mr. Ogundare and Ms. Williams regarding the Court=s Order.

On December 7, 2005, I along with other representatives of ACF and CDI spoke to Ms. Williams and described what Southern Delaware needed to do to comply with the Court=s Order. Southern Delaware agreed to provide a final inventory. In addition, Ms. Williams agreed to meet me the next day to provide access to the Administrative Office and Lavery Lane Center, and keys and titles to vehicles.

On December 8, 2005, Ms. Williams met me at the Administrative Office. Ms. Williams gave me keys to eight vehicles, although Ms. Williams subsequently told me that one set of keys was the wrong set, meaning CDI has keys to seven vehicles. I also received keys to the Administrative Office.

Ms. Williams and I then went to the Lavery Lane Center where we met Beverly Young with the Delaware State Housing Authority (ADSHA@) (the entity that leases the Lavery Lane Center to Southern Delaware). Ms. Williams allowed me to access one room in the Lavery Lane Center B an office that contained children=s records which were given to me. I was not given any employee records. I was also not allowed to go to any other part of the Lavery Lane Center to collect Head Start equipment and supplies. Since December 8, 2005, Southern Delaware has not allowed me to access the Lavery Lane Center. CDI has never been given access to the Seaford Center to retrieve Head Start equipment.

Also on December 8, 2005, I asked Ms. Williams for titles to Head Start vehicles and a final inventory of Head Start equipment. I explained to Ms. Williams that the document faxed on December 7, 2005, could not be a final inventory because the items listed were counted in March, 2004, and also because that document did not list any vehicles. Ms. Williams said she would get the titles and inventory for me the following day.

On December 9, 2005, Ms. Williams called me and said she was on her way to Georgetown, Delaware to pick up duplicate titles for the vehicles. Ms. Williams said she would call me on her way back and arrange to meet at the Taco Bell in Seaford, Delaware (where Mr. Ogundare works) and deliver the titles and inventory. Ms. Williams called me at approximately 5:30 p.m. and asked why I was not at Taco Bell. I explained that I was waiting for Ms. Williams to call. I offered to meet Ms. Williams at Taco Bell, but Ms. Williams said she would put the requested documents in an envelope and under the door of the Administrative Office the next day.

On Saturday, December 10, 2005, I went to the Administrative Office but could find no envelope. I called Ms. Williams and left a message that was not returned. CDI removed equipment, including some computers, from the Administrative Office. The computers that were at the Administrative Office were older computers that were not Dell computers. A maintenance worker at the Administrative Office told me that there previously had been newer-looking Dell computers at the Administrative Office.

Also on December 10, 2005, CDI removed some children=s records and records relating to Southern Delaware=s CACFP application from the Administrative Office. I attempted to remove (3) large locked file cabinet but could not because they were filled, presumably with records. I called Ms. Williams to ask for the key to the file cabinet but that call was not returned. I was not able to locate any employee records at the Administrative Office.

On December 12, 2005, I spoke to Ms. Williams and asked her for the vehicle titles and final inventory. Ms. Williams replied that someone from Southern Delaware would deliver the titles to CDI that day. That never happened.

In the evening of December 12, 2005, Mr. Ogundare called me and said Ms. Williams had dropped off the information I needed and asked me to pick up the information the next day at Taco Bell.

On December 13, 2005, I went to Taco Bell where an employee gave me a document signed by Mr. Ogundare dated December 12, 2005 that listed seven vehicles. I was told Mr. Ogundare was not available to speak to me regarding the document.

I have had no contact with Mr. Ogundare or Ms. Williams since December 13, 2005. I have left at least (3) messages for Ms. Williams but those messages were not returned.

CDI has approximately 37 children enrolled for Head Start services at the Lavery Lane site, and 18 children enrolled for Head Start services at a site in Seaford, but is substantially impaired from beginning Head Start services for children at these sites without access to the Lavery Lane Center, Head Start vehicles, equipment, supplies, records and a final inventory.

In accordance with 28 U.S.C. ' 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated this 20th day of December, 2005.


Thelma M. Sims